

## **REMARKS**

### **In the Claims:**

Claims 15-17, 19-23, and 27-32 remain in this application. Claims 1-14 have been canceled. Claims 18 and 24-26 have been withdrawn. Claims 15-17, 19-21, and 23 have been amended. Claims 27 – 32 have been added.

Claim 30 has been added. It includes the limitations previously present in claim 15, as well as a limitation substantially the same as that previously present in claim 22, which the Examiner indicated had allowable subject matter. However, it lacks the limitations of claims 16 and 17, from which claim 22 previously depended. Applicants believe the cited references fail to disclose the limitations of new claim 30 even absent the additional limitations of claims 16 and 17.

### **Claim Rejections Under 35 U.S.C. 102(b) and 35 U.S.C. 103(a):**

Claim 15 was rejected under 35 U.S.C. 102(b) as being anticipated by Chen (U.S. Pub. 2002/0158318) (hereinafter “Chen”).

Claims 16-17, 19-21, and 23 were rejected under 35 U.S.C. 103(a) as being unpatentable over Chen in view of Beyne et al. (U.S. 6,566,745) (hereinafter “Beyne”), Jiang (U.S. 6,777,268) (hereinafter “Jiang”), and Lee (U.S. 6,613,606) (hereinafter “Lee”).

In light of the amendments to the claims, all rejections, under both 35 U.S.C. 102 and U.S.C. 103, are addressed in this section, below.

Claim 15 has been amended to disclose that the dies are integrated circuit dies,

and to more fully set forth the arrangement of the dies and substrate and the connectors between dies and substrate. The arrangement now recited in claim 15 is shown in Figure 1c, among other places, of Applicants' original disclosure. Applicants believe that none of the cited references disclose or suggest the arrangement recited in amended claim 15.

Chen fails to disclose or suggest the two integrated circuit dies and substrate arranged with the first die above the substrate and a second die above the first integrated circuit die, wherein the volume between the first and second integrated circuit dies are substantially sealed from a surrounding environment, as is recited in amended claim 15. Reference numbers 240 and 220 of Chen refer to substrates (Chen, "base substrate 240" and "interconnection substrate 220" at paragraph [0021]), not to integrated circuit dies. The substrates 220 and 240 of Chen are not integrated circuit dies as recited in the claim. The integrated circuit dies 210 and 230 of Chen are also not arranged or connected as is recited in amended claim 15.

Beyne fails to disclose or suggest the two integrated circuit dies and substrate arranged with the first die above the substrate and a second die above the first integrated circuit die, wherein the volume between the first and second integrated circuit dies are substantially sealed from a surrounding environment, as is recited in amended claim 15. Beyne is concerned with a transparent cover attached to an imaging device, and does not disclose or suggest multiple integrated circuit dies connected as recited in amended claim 15.

Jiang fails to disclose or suggest the two integrated circuit dies and substrate arranged with the first die above the substrate and a second die above the first integrated circuit die, wherein the volume between the first and second integrated circuit dies are

substantially sealed from a surrounding environment, as is recited in amended claim 15.

Jiang is concerned with attaching a die 202 to a substrate 104 (Jiang, Figure 1), and not with stacked integrated circuit dies connected as recited in amended claim 15.

Lee fails to disclose or suggest dies stacked and connected as recited in amended claim 15. Instead of a first plurality of connectors forming an electrical connection between the substrate and the bottom surface of the first integrated circuit, in Lee a top surface of die (22) is connected to a bottom substrate (50) via a portion of substrate (10) that is above the die (22).

Thus, because none of the cited references disclose or suggest the arrangement and connection of integrated circuit dies recited in claim 15, withdrawal of the rejection of claim 15, and claims 16, 17, and 19-23 dependent from claim 15, is requested.

Additionally, Jiang fails to disclose or suggest filler particles having an average diameter greater than the second distance between the first die and second die, as is recited in claim 19. While the filler particles 266 of Jiang may get jammed between the semiconductor die active surface and the semiconductor substrate back surface (Jiang, col. 3, lines 30-35), Jiang sheds no light whatsoever on the average diameter of the filler particles, much less that the average diameter is greater than the second distance between the first die and second die.

Respectfully submitted,

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